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Schneider & Groh, LPA

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Environmental
Cleanup Office

January 28, 2010

Via UPS Second Day Air

Ms. Kristine Koch
Remedial Project Manager
United States Environmental Protection Agency, Region 10
Office of Environmental Cleanup, Mail Code ECL-115
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

**Re: Cenveo Corporation's First Supplemental Response to U.S. EPA's
104(e) Request for the Portland Harbor Superfund Site**

Dear Ms. Koch:

Enclosed please find a CD containing Cenveo Corporation's ("Cenveo") First Supplemental Response ("Supplemental Response") to U.S. EPA's 104(e) Request ("Request") for the Portland Harbor Superfund Site. While a copy of Cenveo's Declaration is included with its Supplemental Response for 2000 NW Wilson Street on the CD, the original of that Declaration will be forwarded to you when received from Cenveo. This cover letter is also included on the CD.

Cenveo's Supplemental Response contains a complete response for an additional facility that one Cenveo employee recalled. This facility was on NW Nela Street. Although Cenveo is providing this response, it has nearly no substantive information regarding that facility. In addition, Cenveo has discovered some additional limited information relating to its main facility in Portland at 2000 NW Wilson Street. In the response document containing the additional information for the 2000 NW Wilson Street facility, only new information is set forth in the response; Cenveo has not restated its original responses. There are also several new exhibits that accompany the Supplemental Response for the 2000 NW Wilson Street facility; each exhibit is referenced in the response.

As in its initial Response, where EPA has used a series of subparts in which to pose requests related to a primary Request, if Cenveo has been able to respond in a short sentence to all of the subsections for which it has information, Cenveo has done

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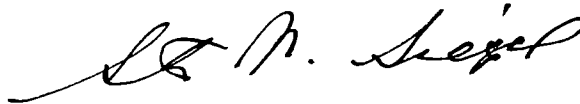
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Ms. Kristine Koch
January 28, 2010
Page Two

so with the hope that EPA can more easily review and understand the information provided in the sentence format, rather than trying to piece together the information from responses in several subsections.

Cenveo continues to object in general to the Request as being overly broad and overreaching, not being designed to limit the Request to develop only information that is relevant to the Portland Harbor Superfund Site, being outside of the authority granted to EPA to request information from potentially responsible parties ("PRPs") pursuant to Section 104(e) and requiring PRPs to spend excessive amounts of money to respond that far outweigh any benefit to EPA or the environment. However, without waiving these objections, and also subject to any other objections that Cenveo has cited in response to individual requests, Cenveo has put forth a good-faith attempt to provide the EPA with information responsive to each request.

Very truly yours,

A handwritten signature in black ink, appearing to read "Steve N. Siegel", written in a cursive style.

Steve N. Siegel
Counsel to Cenveo Corporation

SNS/cp
Enclosure
cc: Pete Popovics (CD only)
Marcia E. Berry, Esq. (CD only)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WA 98101

TARGET SHEET

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**A copy of the document may be requested from the Superfund Records Center.

Document Information

Document ID #: *1445720*

File #: 11.3.121.1 V.1

Site Name: PORSE - Portland Harbor

104(e) Response Cenveo Corporation:

**CD Transmitting First Supplemental Response to EPA's Request for Information – (02/01/2010).
(Contents of CD Have Been Processed and Uploaded Into SDMS)**